

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**PACEM SOLUTIONS INTERNATIONAL,  
LLC**

Plaintiff,

v.

**U.S. SMALL BUSINESS  
ADMINISTRATION,**

-and-

**ISABELLA CASILLAS GUZMAN, IN  
HER CAPACITY AS ADMINISTRATOR,  
U.S. SMALL BUSINESS  
ADMINISTRATION**

Defendants.

Civil Action No.: 1:23-cv-1702 (LMB/IDD)

**MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P 56, Plaintiff PACEM Solutions International, LLC (“PACEM”) respectfully moves this Court for Summary Judgment as to Counts I, II and IV of the Complaint filed on behalf of Plaintiff PACEM.

PACEM will rely on the arguments set forth in the attached Memorandum in Support of Motion for Summary Judgment and oral argument, if permitted or requested, in support of this request.

For the reasons set forth in the accompanying Memorandum in Support of Motion for Summary Judgment, Plaintiff PACEM respectfully requests this court grant this motion and direct Defendants US Small Business Administration (“SBA”) and Isabella Casillas Guzman, in

her capacity as Administrator, U.S. Small Business Administration to make the remaining four subsidy payments on behalf of PACEM as required under the CARES Act.

July 1, 2024

Respectfully Submitted,  
Plaintiff PACEM Solutions International,  
LLC  
By counsel

/s/ Milton C. Johns  
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